

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

GOBIND SINGH, M.D., PH.D., )  
Plaintiff, )  
v. ) Civil Action No. 3:17-cv-00400  
VANDERBILT UNIVERSITY MEDICAL ) Judge Eli J. Richardson  
CENTER AND VANDERBILT ) Magistrate Barbara D. Holmes  
UNIVERSITY, )  
Defendants. )

**DEFENDANTS' EXHIBIT LIST**

Defendants, by counsel, expressly reserve the right to use any of the following material as exhibits at trial. Defendants further reserve the right to amend, modify or change this list prior to and at trial to the extent allowed by the Federal Rules of Civil Procedure and the Court's Local Rules, and reserve the right to introduce any document produced in discovery in this case.

**Exhibits Defendants Expect to Introduce**

1. Plaintiff's Complaint in this matter including attached Exhibits
2. Plaintiff's Responses to Defendants First Set of Interrogatories and Requests for Production of Documents
3. Dismissal Letter dated February 25, 2016
4. August 3, 2016 Confidential Memorandum
5. February 4, 2016 Letter from Damian Marshall
6. July 29, 2015 Singh Suspension Letter (VUMC 0123)
7. June 30, 2015 Singh Suspension Decision Letter (VUMC 0095-0108)
8. June 15, 2015 Singh Suspension Letter (VUMC 0093-0094)

9. Consent and Authorization for Release of Information and Waiver of Liability
10. September 4, 2015 Email from Richard Braun
11. September 11, 2015 Email from Damian Marshall
12. September 25, 2015 Email from Batia Karabel
13. August 17, 2015 Typed Written Statement from Plaintiff
14. August 24, 2015 Typed Written Statement from Plaintiff
15. August 25, 2015 Email from Damian Marshall
16. Emails between Dr. Laura Wayman and Dr. Donald Brady dated 07/31/2015 (VUMC 2089)<sup>1</sup>
17. Emails between Dr. Laura Wayman and Dr. Donald Brady dated August 5-6, 2015 (VUMC 2088)
18. Emails between Dr. Laura Wayman and Dr. Donald Brady dated 04/15/2015-04/17/2015 (VUMC 2091-2097)
19. Emails between Dr. Laura Wayman and Dr. Donald Brady dated 05/12/2015 (VUMC 2103-2104)
20. Notes from Meeting with Gobind Singh (VUMC 2109-2114)
21. Emails between Dr. Laura Wayman and Dr. Donald Brady dated 5/19/2015 (VUMC 2125-2128)
22. Emails between Dr. Laura Wayman and Dr. Donald Brady dated 05/25/2015 (VUMC 2130-2150)

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<sup>1</sup> VUMC citations reference Defendants' bates-stamped document production.

23. Emails between Dr. Laura Wayman and Dr. Donald Brady dated 06/12/2015-6/15/2015 (VUMC 2156-2166)
24. Plan for Improvement by Dr. Gobind Singh (undated) (VUMC 2170)
25. Emails between Dr. Donald Brady, Dr. Paul Sternberg and Dr. Laura Wayman dated June 22, 2015-June 23, 2015 (VUMC 2214-2216)
26. Emails between Dr. Donald Brady and Dr. Laura Wayman dated 7/15/2015 (VUMC 2317-2319)
27. Emails between Dr. Donald Brady and Dr. Laura Wayman dated 7/24/2015-7/27/15 (VUMC 2336-2338, 2346-2362 )
28. Emails between Dr. Donald Brady and Dr. Laura Wayman dated 7/15/2015 (VUMC 2317-2319)
29. Plaintiff Gobind Singh's Deposition, including all exhibits (Taken 4/15/2019)
30. Hypothyroid Timeline (Ex. 1 from Deposition of Gobind Singh)
31. Request for Accommodation (Ex. 13 from Deposition of Gobind Singh)
32. Reasonable Accommodation Request Form (Ex. 14 from Deposition of Gobind Singh)
33. 8/17/19 letter (Ex. 22 from Deposition of Gobind Singh)
34. Summative Evaluation Letter from Dr. Brady to New York Medical Center
35. House Staff Manual
36. Approval for request for time off
37. Dr. Singh W-2s from 2011 through 2021
38. Dr. Singh's Tax Returns
39. Life Sciences Franchise Press Release dated 1-25-21 regarding hiring of Dr. Gobind Singh

### **Exhibits Defendants May Introduce at Trial**

40. Emails between Dr. Laura Wayman and Dr. Donald Brady dated October 14, 2015 (VUMC 2086-87)
41. Timeline of Disciplinary Actions
42. Promotion letter dated April 6, 2015
43. October 3, 2014 E-mail
44. Document from Vanderbilt dated June of 2015 (Ex. 7 from Deposition of Laura Wayman)
45. Email from Christina Estrada (Ex. 8 from Deposition of Laura Wayman)
46. Letter from Howard Baum (Ex. 10 from Deposition of Laura Wayman)
47. Gobind Singh – Evaluation dated October 1, 2012 (VUMC 0270-0282)
48. Gobind Singh – End of Year Evaluation – January 1 – June 30, 2015 (VUMC 0301-0384)
49. Declaration (Ex. 24 from Deposition of Gobind Singh)
50. 6/28/18 E-mail (Ex 25 from Deposition of Gobind Singh)
51. 6/29/18 E-mail (Ex. 26 from Deposition of Gobind Singh)
52. Dr. Singh Evaluations
53. Dr. Laura Wayman's Deposition, including all exhibits (Taken 4/12/2019)
54. Dr. Donald Brady's Deposition, including all exhibits (Taken 4/19/2019)
55. Dr. Justin Sternberg's Deposition, including all exhibits (Taken 5/8/2019)
56. 5/15/19 Declaration of Gobind Singh (Ex. P to Dkt. 80)
57. 8/17/20 Declaration of Gobind Singh (Ex. B to Dkt. 135)
58. 6/8/21 Declaration of Gobind Singh (Ex. A to Dkt. 151)
59. December 29, 2015 Confidential Memorandum from EAD (VUMC 0004-0033)
60. EAD Records, Part 1-9, excluding objectionable text messages (VUMC 0595-1955)

61. Supplemental Evaluation Documents (VUMC 1956-2085)
62. List of Ophthalmology Residents (VUMC 0592-0594)
63. Appeal Committee Documents (VUMC 0392-0417)
64. Communications with or about New York Medical Center (VUMC 0587-0591)
65. Notes Regarding Incident Leading to Suspension (VUMC 0385-0387)
66. Gobind Singh Evaluations (VUMC 0301-0384)
67. Gobind Singh Evaluations (VUMC 0238-0300)
68. Gobind Singh Emails (VUMC 0181-0237)
69. Gobind Singh Figure 1 (VUMC 0389-0391)
70. Resident Appointment Letter 4-06-2015 (VUMC 0388)
71. Correspondence regarding Dr. Singh Performance Deficiencies (VUMC 0500-0586)
72. Correspondence regarding Dr. Singh (VUMC 0478-0499)
73. Dr. Singh Biosketch (VUMC 0418-0477)
74. Dr. Singh EAP File (VUMC 0171-0180)
75. Dr. Singh Release and Waiver (VUMC 0153-0154)
76. August 3, 2016, Supplemental Confidential Memorandum (VUMC 0155-0157)
77. February 2, 2016 Supplemental EAD Report (VUMC 0137-0139)
78. Full HOC Charge Letter (VUMC 0124-0135)
79. September 9, 2016 Vanderbilt Position Statement (VUMC 0037-0092)
80. November 30, 2016 EEOC Dismissal and Notice of Right to Sue (VUMC 0034-0036)
81. Emails between Dr. Donald Brady and Sandra Holtzclaw dated June 21, 2015 (VUMC 2204)

82. Email to Dr. Donald Brady dated June 30, 2015 with letter to Dr. Gobind Singh (VUMC 2217-2231)
83. Email from Dr. Donald Brady to Sandra Holtzclaw dated June 30, 2015 with draft suspension letter to Dr. Gobind Singh (VUMC 2253-2257)
84. Email from Rebecca Swan to Dr. Donald Brady dated July 10, 2015 (VUMC 2266)
85. Emails between Dr. Donald Brady and Nora Gilgallon-Keele dated July 10, 2015 (VUMC 2267-2268)
86. Emails between Dr. Donald Brady and Dr. Laura Wayman dated July 11, 2015 (VUMC 2270-2271)
87. Emails between Dr. Donald Brady and Rebecca Swan dated July 13, 2015 (VUMC 2313-2314)
88. Email from Sandra Holtzclaw to Dr. Donald Brady dated July 16, 2015 with documents to be reviewed by GME Review Committee (VUMC 2320-2327)
89. Email from Dr. Donald Brady to Sandra Holtzclaw dated July 16, 2015 (VUMC 2330-2332)
90. Emails between Dr. Donald Brady and Dr. Laura Wayman dated July 22, 2015 (VUMC 2333-2334)
91. Emails between Dr. Donald Brady and Dr. Laura Wayman dated July 27, 2015 (VUMC 2356)
92. Emails between Dr. Donald Brady and Dr. Laura Wayman dated July 27, 2015 (VUMC 2357)
93. Emails between Dr. Donald Brady and Dr. Laura Wayman dated July 27, 2015 with preliminary report (VUMC 2358-2361)

94. Email from Dr. Laura Wayman to Dr. Donald Brady dated July 28, 2015 (VUMC 2365)
95. Emails between Dr. Donald Brady and Dr. Laura Wayman dated July 28, 2015 (VUMC 2366)
96. Email from Dr. Laura Wayman to Dr. Donald Brady dated July 29, 2015 (VUMC 2369)
97. Email from Dr. Laura Wayman to Dr. Donald Brady dated July 29, 2015 (VUMC 2370-2371)
98. Emails between Dr. Donald Brady and Dr. Laura Wayman dated July 31, 2015 (VUMC 2381)
99. Emails between Dr. Donald Brady and Nora Gilgallon-Keele dated July 31, 2015 (VUMC 2382)
100. Emails between Dr. Donald Brady and Nora Gilgallon-Keele dated July 31, 2015 (VUMC 2383-2384)
101. Email from Audrey Patrick to Dr. Donald Brady dated August 3, 2015 (VUMC 2386)
102. Email from Dr. Donald Brady to Sandra Holtzclaw dated August 3, 2015 with letter to Dr. Gobind Singh (VUMC 2387-2388)
103. Emails between Dr. Donald Brady and Lisa King dated August 5, 2015 (VUMC 2397-2398)
104. Email from Sandra Holtzclaw to Dr. Donald Brady dated August 6, 2015 (VUMC 2399)
105. Emails between Dr. Donald Brady and Nora Gilgallon-Keele dated August 27, 2015 (VUMC 2406)
106. Emails between Dr. Donald Brady and Dr. Laura Wayman dated October 12, 2015 (VUMC 2408)

107. Emails between Dr. Donald Brady and Dr. Laura Wayman dated October 14, 2015 (VUMC 2409-2410)

108. Emails between Dr. Donald Brady and Dr. Paul Sternberg dated October 26, 2015 (VUMC 2411)

109. Emails between Dr. Donald Brady and Dr. Laura Wayman dated October 28, 2015 (VUMC 2412)

110. Email from Audrey Patrick to Dr. Donald Brady dated December 9, 2015 (VUMC 2413)

111. Emails between Dr. Donald Brady and Dr. Paul Sternberg dated December 14, 2015 (VUMC 2414)

112. Email from Dr. Laura Wayman to Dr. Donald Brady dated January 7, 2016 (VUMC 2448)

113. Email from Dr. Donald Brady to Dr. Laura Wayman dated January 8, 2016 (VUMC 2451)

114. Emails between Dr. Donald Brady and Dr. Laura Wayman dated January 8, 2016 (VUMC 2452)

115. Emails between Dr. Donald Brady, Dr. Laura Wayman, and Mary Craig Tortorice dated January 8, 2016 (VUMC 2453)

116. Emails between Dr. Donald Brady, Dr. Laura Wayman, Mary Craig Tortorice, and ACGME – Web Accreditation Data System dated January 8, 2016 (VUMC 2454-2455)

117. Emails between Dr. Donald Brady, Dr. Laura Wayman, Mary Craig Tortorice, and Tom Hackett dated January 8, 2016 (VUMC 2456-2457)

118. Emails between Dr. Donald Brady, Dr. Laura Wayman, and Mary Craig Tortorice dated February 18, 2016 with letter to Dr. Gobind Singh (VUMC 2467-2468)

119. Email from Mary Craig Tortorice to Dr. Donald Brady dated February 22, 2016 (VUMC 2469)

120. Email from Dr. Donald Brady to Geraldina Rahmani dated February 24, 2016 with letter to Dr. Gobind Singh (VUMC 2470-2473)

121. Email from Audrey Patrick to Dr. Donald Brady dated February 25, 2016 (VUMC 2474)

122. Emails between Dr. Donald Brady and Audrey Patrick dated February 25, 2016 (VUMC 2475)

123. Emails between Dr. Donald Brady and Dr. Laura Wayman dated February 25, 2016 (VUMC 2476)

124. Emails between Dr. Donald Brady and Dr. Laura Wayman dated February 25, 2016 (VUMC 2477-2478)

125. Emails between Dr. Donald Brady, Dr. Laura Wayman, and Audrey Patrick dated February 25, 2016 (VUMC 2479-2480)

126. Email from Rebecca Swann to Dr. Donald Brady dated March 2, 2016 (VUMC 2484)

127. Email from Rebecca Swann to Dr. Donald Brady dated March 17, 2016 (VUMC 2485-2486)

128. Email from Dr. Donald Brady to Geraldina Rahmani dated March 17, 2016 with letter to Dr. Gobind Singh (VUMC 2487-2489)

129. Email from Dr. Donald Brady to self-dated March 20, 2016 (VUMC 2490)

130. Email from Geraldina Rahmani to Dr. Donald Brady dated March 21, 2016 with letter to Dr. Gobind Singh (VUMC 2491-2492)

131. Emails between Dr. Donald Brady and Dr. Laura Wayman dated April 17, 2015 (VUMC 2098-2099)

132. Emails between Dr. Donald Brady and Dr. Laura Wayman dated April 17, 2015 (VUMC 2100-2102)

133. Emails between Dr. Donald Brady and Dr. Laura Wayman dated May 12, 2015 with attachment (VUMC 2103-2107)

134. Email from Dr. Laura Wayman to Dr. Donald Brady dated May 13, 2015 with attachment (VUMC 2108-2114)

135. Email from Nora Gilgallon-Keele to Dr. Donald Brady dated May 14, 2015 with attachment (VUMC 2115-2120)

136. Email from Dr. Donald Brady to Dr. Laura Wayman dated May 14, 2015 with attachment (VUMC 2121-2124)

137. Email from Dr. Laura Wayman to Dr. Donald Brady dated May 21, 2015 (VUMC 2129)

138. Email from Dr. Laura Wayman to Dr. Donald Brady dated May 25, 2015 with attachment (VUMC 2130-2144)

139. Email from Dr. Laura Wayman to Dr. Donald Brady dated May 25, 2015 (VUMC 2145)

140. Emails between Dr. Donald Brady and Dr. Laura Wayman dated May 25, 2015 (VUMC 2146)

141. Email from Dr. Laura Wayman to Dr. Donald Brady dated May 25, 2015 (VUMC 2147-2150)

142. Emails between Dr. Donald Brady and Dr. Laura Wayman dated May 26, 2015 (VUMC 2151-2155)

143. Email from Dr. Laura Wayman to Dr. Donald Brady dated June 16, 2015 with attachment (VUMC 2167-2170)

144. Emails between Dr. Donald Brady and Dr. Laura Wayman dated June 16, 2015 (VUMC 2171)

145. Emails between Dr. Donald Brady and Dr. Laura Wayman dated June 16, 2015 (VUMC 2172-2173)

146. Emails between Dr. Donald Brady and Dr. Laura Wayman dated June 16, 2015 (VUMC 2174)

147. Email from Dr. Donald Brady to Nora Gilgallon-Keele dated June 17, 2015 (VUMC 2178)

148. Email from Nora Gilgallon-Keele to Dr. Donald Brady with attachment (VUMC 2180-2184)

149. Emails between Dr. Donald Brady and Nora Gilgallon-Keele dated June 17, 2015 (VUMC 2185)

150. Emails between Dr. Donald Brady and Dr. Laura Wayman dated June 17, 2015 (VUMC 2186-2187)

151. Email from Nora Gilgallon-Keele to Dr. Donald Brady dated June 18, 2015 with attachment (VUMC 2189-2190)

152. Emails between Dr. Donald Brady, Dr. Paul Sternberg, and Dr. Laura Wayman dated June 18, 2015 (VUMC 2192-2193)

153. Emails between Dr. Donald Brady, Roger Dmochowski, Dr. Paul Sternberg, and Dr. Laura Wayman dated June 18, 2015 (VUMC 2194-2195)

154. Email from Dr. Cristina Estrada to Dr. Donald Brady dated June 19, 2015 (VUMC 2196)

155. Emails from Dr. Donald Brady to Dr. Cristina Estrada dated June 20, 2015 (VUMC 2197)

156. Emails between Dr. Donald Brady and Dr. Cristina Estrada dated June 20-21, 2015 (VUMC 2198-2199)

157. Email from Dr. Donald Brady to Sandra Holtzclaw dated June 21, 2015 (VUMC 2200)

158. Emails between Dr. Donald Brady and Dr. Cristina Estrada dated June 20-21, 2015 (VUMC 2201-2203)

159. Emails between Dr. Donald Brady and Dr. Laura Wayman dated June 22, 2015 (VUMC 2205)

160. Email from Audrey Patrick to Dr. Donald Brady dated June 22, 2015 ( VUMC 2206)

161. Email from Dr. Laura Wayman to Dr. Donald Brady dated June 22, 2015 ( VUMC 2207)

162. Emails between Dr. Donald Brady, Sandra Holtzclaw, Molly Cole, Lisa King, and Patricia Craft dated June 21-22, 2015 ( VUMC 2208)

163. Email from David Herren to Dr. Donald Brady dated June 23, 2015 with attachment ( VUMC 2209-2210)

164. Emails between Dr. Donald Brady, Dr. Paul Sternberg, and Dr. Laura Wayman dated June 22-34, 2015 ( VUMC 2213-2214)

165. Emails between Dr. Donald Brady and Dr. Laura Wayman dated June 23, 2015 ( VUMC 2215-2216)

166. Email from Dr. Laura Wayman to Dr. Donald Brady dated June 30, 2015 with attachment ( VUMC 2247-2249)

167. Email from Dr. Laura Wayman to Dr. Donald Brady dated June 30, 2015 ( VUMC 2250)

168. Emails between Dr. Donald Brady and Dr. Laura Wayman dated June 30, 2015 ( VUMC 2258-2259)

169. Emails between Dr. Donald Brady and Audrey Patrick dated July 8, 2015 ( VUMC 2264)

170. Email from Mischon Ramey to Dr. Donald Brady dated July 13, 2015 with attachment (VUMC 2272-2312)

171. Email from Dr. Laura Wayman to Dr. Donald Brady dated July 15, 2015 with attachment (VUMC 2315-2316)
172. Email from Dr. Laura Wayman to Dr. Donald Brady dated July 16, 2015 with attachment (VUMC 2328-2329)
173. Emails between Damian Marshall and Dr. Donald Brady dated August 6, 2015 (VUMC 2400)
174. Emails between Damian Marshall and Dr. Donald Brady dated August 10, 2015 (VUMC 2401-2402)
175. Emails between Damian Marshall and Dr. Donald Brady dated August 10, 2015 (VUMC 2403-2404)
176. Emails between Damian Marshall and Dr. Donald Brady dated August 25, 2015 (VUMC 2405)
177. Emails between Damian Marshall and Dr. Donald Brady dated September 8, 2015 (VUMC 2407)
178. Emails between Damian Marshall and Dr. Donald Brady dated December 29, 2015 (VUMC 2416)
179. Emails between Damian Marshall and Dr. Donald Brady dated December 29, 2015 (VUMC 2417-2447)
180. Emails between Damian Marshall and Dr. Donald Brady dated January 7, 2016 (VUMC 2449-2450)
181. Emails between Damian Marshall and Dr. Donald Brady dated February 2, 2016 (VUMC 2458-2462)

182. Emails between Damian Marshall and Dr. Donald Brady dated February 4, 2016 (VUMC 2463-2464)

183. Emails between Damian Marshall and Dr. Donald Brady dated February 4, 2016 (VUMC 2465)

184. Emails between Gobind Singh and Dr. Donald Brady dated June 16, 2015 (VUMC 2175)

185. Emails between Gobind Singh and Dr. Donald Brady dated June 16, 2015 (VUMC 2176)

186. Emails between Gobind Singh and Dr. Donald Brady dated June 16, 2015 (VUMC 2177)

187. Emails between Gobind Singh and Dr. Donald Brady dated June 17, 2015 (VUMC 2179)

188. Emails between Gobind Singh and Dr. Donald Brady dated June 23, 2015 (VUMC 2211)

189. Emails between Gobind Singh and Dr. Donald Brady dated June 23, 2015 (VUMC 2212)

190. Emails between Gobind Singh and Dr. Donald Brady dated June 30, 2015 (VUMC 2232-2246)

191. Emails between Gobind Singh and Dr. Donald Brady dated June 30, 2015 (VUMC 2251-2252)

192. Emails between Gobind Singh and Dr. Donald Brady dated July 1, 2015 (VUMC 2260-2261)

193. Emails between Gobind Singh and Dr. Donald Brady dated July 1, 2015 (VUMC 2262-2263)

194. Emails between Gobind Singh and Dr. Donald Brady dated July 9, 2015 (VUMC 2265)

195. Emails between Gobind Singh and Dr. Donald Brady dated July 10, 2015 (VUMC 2269)

196. Emails between Gobind Singh and Dr. Donald Brady dated July 16, 2015 (VUMC 2320-2327)

197. Emails between Gobind Singh and Dr. Donald Brady dated July 16, 2015 (VUMC 2330-2332)

198. Emails between Gobind Singh and Dr. Donald Brady dated July 24, 2015 (VUMC 2335)

199. Emails between Gobind Singh and Dr. Donald Brady dated July 24, 2015 (VUMC 2337)

200. Emails between Gobind Singh and Dr. Donald Brady dated July 25, 2015 (VUMC 2339)

201. Emails between Gobind Singh and Dr. Donald Brady dated July 25, 2015 (VUMC 2340)

202. Emails between Gobind Singh and Dr. Donald Brady dated July 26, 2015 (VUMC 2341-2343)

203. Emails between Gobind Singh and Dr. Donald Brady dated July 26, 2015 (VUMC 2344-2345)

204. Emails between Gobind Singh and Dr. Donald Brady dated July 27, 2015 (VUMC 2363-2364)

205. Emails between Gobind Singh and Dr. Donald Brady dated July 28, 2015 (VUMC 2367)

206. Emails between Gobind Singh and Dr. Donald Brady dated July 28, 2015 (VUMC 2368)

207. Emails between Gobind Singh and Dr. Donald Brady dated July 29, 2015 (VUMC 2372)

208. Emails between Gobind Singh and Dr. Donald Brady dated July 29, 2015 (VUMC 2373)

209. Emails between Gobind Singh and Dr. Donald Brady dated July 30, 2015 (VUMC 2374-2376)

210. Emails between Gobind Singh and Dr. Donald Brady dated July 30, 2015 (VUMC 2377-2378)

211. Emails between Gobind Singh and Dr. Donald Brady dated July 30, 2015 (VUMC 2379-2380)

212. Emails between Gobind Singh and Dr. Donald Brady dated August 3, 2015 (VUMC 2385)

213. Emails between Gobind Singh and Dr. Donald Brady dated August 3, 2015 (VUMC 2389)

214. Emails between Gobind Singh and Dr. Donald Brady dated August 3, 2015 (VUMC 2390)

215. Emails between Gobind Singh and Dr. Donald Brady dated August 4, 2015 (VUMC 2392-2393)

216. Emails between Gobind Singh and Dr. Donald Brady dated August 4, 2015 (VUMC 2394)

217. Emails between Gobind Singh and Dr. Donald Brady dated August 4, 2015 (VUMC 2395)

218. Emails between Gobind Singh and Dr. Donald Brady dated August 4, 2015 (VUMC 2396)

219. Emails between Gobind Singh and Dr. Donald Brady dated February 10, 2016 (VUMC 2466)

220. Emails between Gobind Singh and Dr. Donald Brady dated February 26, 2016 (VUMC 2481)

221. Emails between Gobind Singh and Dr. Donald Brady dated February 27, 2016 (VUMC 2482)

222. Emails between Gobind Singh and Dr. Donald Brady dated February 27, 2016 (VUMC 2483)

223. Emails between Gobind Singh and Dr. Donald Brady dated March 17, 2016 (VUMC 2485-2486)

224. Emails between Dr. Paul Sternberg, Laura Wayman and Dr. Donald Brady dated June 18, 2015 (VUMC 2188)

225. Emails between Dr. Paul Sternberg, Laura Wayman and Dr. Donald Brady dated June 18, 2015 (VUMC 2192-2193)

226. Emails between Roger Dmochowski and Dr. Donald Brady dated June 18, 2015 (VUMC 2194-2195)

227. Emails between Dr. Paul Sternberg, Laura Wayman and Dr. Donald Brady dated June 22, 2015 (VUMC 2205)

228. Emails between Dr. Paul Sternberg and Dr. Donald Brady dated June 23, 2015 (VUMC 2213-2214)

229. Emails between Laura Wayman and Dr. Donald Brady dated July 28, 2015 (VUMC 2365)

230. Emails between Dr. Paul Sternberg, Sandra Holtzclaw, Laura Wayman and Dr. Donald Brady dated August 6, 2015 (VUMC 2399)

231. Emails between Dr. Paul Sternberg and Dr. Donald Brady dated October 26, 2015 (VUMC 2411)

232. Emails between Dr. Paul Sternberg and Dr. Donald Brady dated December 14, 2015 (VUMC 2414)

Respectfully submitted,

/s/ Luther Wright, Jr.

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### **CERTIFICATE OF SERVICE**

I hereby certify that on August 30, 2021, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

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